

IGAP FY 2012 IGAP SPECIAL PROJECT NARRATIVE
October 1, 2013 to September 30, 2014

PROJECT/BUDGET PERIOD: October 1, 2013 to September 30, 2014

Assessment of Kodiak Island Tribes' Subsistence Consumption

SUN'AQ TRIBE OF KODIAK

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PROJECT SUMMARY:

The proposed project is to ascertain Sug'piaq tribal members' present consumption rates, patterns, habits, preparation and cooking methods of anadromous and resident fish species, as well as other subsistence resources, caught around KODIAK, AK. It is known that human health risks are posed by exposure to dioxins, heavy metals, and polychlorinated biphenyls (PCBs) through ingestion of contaminated fish and other subsistence foods, such as clams. Fish, though, is the main subsistence food consumed by Sug'piaq tribal members. Currently, the U.S. EPA uses an estimated national per capita fish consumption rate of 4.58 ± 0.42 grams/person/day for "as prepared" freshwater and estuarine finfish and shellfish and an estimated 6.30 ± 0.58 grams/person/day for "uncooked" freshwater and estuarine finfish and shellfish to establish human health based water quality criteria for toxins (USEPA 2002). The EPA recommended "safe" fish ingestion rate is only 32 grams per day (g/d). Unfortunately, contaminant testing and dietary consumption survey questions in the Sug'piaq have not focused towards the traditional preparation, and cooking, methods of Sug'piaq tribes for fish (i.e. only raw, whole fish (including gut contents), skinless fish fillets, and halibut roasts were tested). Consumption of particular fish parts (skin, head, eggs, bones, and organs) was not evaluated nor how the frequency, and process, of particular fish cooking methods (fried, boiled, poached, baked, broiled, smoked, dried, raw, roasted, canned, etc.) or breastfeeding could influence exposure to contaminants. Fish preparation methods, as well as cooking methods, can greatly influence exposure to contaminants.

Given that this important information is unknown and that the daily rate of fish consumption for Sug'piaq tribal members could be estimated to be dramatically higher than the national average estimated by EPA, the Sun'aq Tribe of Kodiak STK proposes to conduct a much more comprehensive study/assessment of fish consumption, and risk of contaminant exposure through this consumption, for Alaska Native Indians of the Sug'piaq area. This study would occur in two phases. The first phase (phase 1), which is what STK is requesting funding for in this proposal, would be a very thorough consumption assessment of fish, as well as several other subsistence foods, of tribal members from the villages of Sun'aq, Ouzinkie, Larsen Bay, Karluk, Akhiok, and Old Harbor. Quite possibly, if some village do not wish to participate then the area to be

studied would be one northern tribe one western tribe one southern tribe and one eastern tribe on Kodiak Island covering the North Pacific, Shelikoff Straits, and the Gulf of Alaska. The second phase would involve actual testing of contaminant levels in fish, as well as other subsistence foods, revealed to be consumed frequently and/or in large quantities by tribal members, caught within the waters of Sug'piaq Tribal Area. STK will seek additional funding to carry out phase 2 of the study. The Sun'aq Tribe of Kodiak has developed this narrative proposal under the statutory authority provided by the Indian Environmental General Assistance Program Act of 1992, and is consistent with EPA's 2006 – 2011 Strategic Plan under Goal 5, Compliance and Environmental Stewardship, Objective 5.3, Improve Human Health and the Environment in Indian Country.

PROJECT BACKGROUND:

The Alaska Native Indian Villages (tribes) of Sun'aq, Ouzinki, Larsen Bay, Karluk, Akhiok, and Old Harbor share the rich subsistence resources of the North Pacific and Gulf of Alaska (citon, fish, crab, shrimp, clams, mussels, octopus, sea birds and marine mammals (sea otters, seals, sea lion) and have relied on these resources for thousands of years. Kodiak Island is a large island estuary in south-central Gulf of Alaska that connects to the North Pacific Ocean. It extends Southwest from the Gulf of Alaska along the south-central Alaskan mainland coast from the Cape Douglas to Sutwik Island and which is approximately 50 miles from the mainland coast of the Alaska Peninsulas. The Kodiak Archipelago is about 300 miles long and 100 miles wide. Seldovia, Port Graham, and Nanwalek are located along the southwest portion of the Kenai Peninsula while Tyonek is located along the northwest shore of Upper Cook Inlet.



Contaminants are generated from oil operations and enter Cook Inlet through the treated wastewaters and drilling mud. Potential chemicals carried to the Island that may possibly be found around the Sug'piaq area could include oil, grease, mercury, cadmium, barium sulfite, and chemical additives such as flocculants, oxygen scavengers, biocides, cleansers, and scale corrosion inhibitors. Since drilling operations began in the 1960s, offshore drilling for oil and gas in Cook Inlet has generated more than 978 million barrels of treated wastewater. While some of the platforms separate and treat production fluids (oil, gas, and water) right at the platforms and then directly discharge the production water into ever moving Cook Inlet and then flows out to the Gulf of Alaska, others pipe production fluids to three shore-based facilities (Granite Point, Trading Bay, and East Foreland) for separation and treatment. Production water from these shore-based facilities is discharged to Cook Inlet following treatment (either directly from the on-shore facilities or from platforms). It is estimated that 253 tons of oil are discharged into Cook Inlet, alone, from treated wastewaters each year (MMS 2003). Additionally, Cook Inlet receives about an average of 182.3 thousand cubic meters per day of wastewater from 10 municipalities (MMS 2003). Kodiak Island is southwest of Cook Inlet and the Predominate current flow from the Cook Inlet is southwest and counter clockwise in the Gulf of Alaska, which makes for a potential of toxins in the Sug'piaq Area.

Along with oil contaminants there are many environmental and public health issues facing the Kodiak community and Sun'aq tribal membership. Military Debris in the Sun'aq Area is also of high concern in relation to subsistence foods. There are several Formerly Used Defense Sites (FUDS) on Kodiak Island from military occupation over the last 100 years. From research it has been found that there is a significant mass of military debris, derelict lost or abandoned commercial fishing gear, and toxic waste buried on lands, dumped in freshwaters, and discarded on the ocean floor. Aside from incident response and point remediation, no overall look at the long term impact and build up of this debris and toxic waste has been considered. Interviews with local elders indicate that there may be undocumented sites for fuel, ammunition, and chemical storage and various dump sites on the U.S. Coast Guard Base and elsewhere around the Island. Sun'aq Tribe of Kodiak is concerned about these sites, and potential contamination of land, water, and subsistence foods.

Much concern exists over the risk posed to human health through exposure to these contaminants through the consumption of traditional subsistence foods. Traditional foods comprise 40 percent to 90 percent of rural Alaskan diets and therefore high levels of contaminants in these resources can be especially dangerous to Alaska Native Indians (ATSDR 2009). One of the most important subsistence resources to tribal members in the Sug'piaq Area are salmon. PCBs tend to concentrate in the fatty portions of the fish as well as in the heads, skin, guts, liver, and eggs (roe). Baking, broiling, grilling, or steaming may reduce PCBs and other chemicals, compared to frying with breading and/or batter, since they allow the fats and juices to drain away from the fish. Cooking also helps to reduce the level of many chemical contaminants present in a fish compared to eating it raw. Furthermore, certain toxic contaminants can be passed to newborn infants from their mother's breast milk and so female respondents

should be asked whether they have given birth, whether the child or children had been or are being breast fed, and at what age their child ceased or will cease breastfeeding.

Since fish species, especially salmon, are a vital part of the Alaska Native Indian diet for residents of Sun'aq, Ouzinki, Larsen Bay, Karluk, Akhiok, and Old Harbor, STK feels strongly that all these villages will benefit from the information obtained through a new subsistence consumption assessment which addresses the issues stated in this proposed narrative as well as to collect more consumption data on non-fish subsistence foods. All these villages have a vested interest in this information since it directly relates to the health of their community members. Therefore, STK is seeking special project funding to carry out the first phase of the proposed project (i.e. conduct an assessment). It is STK's wish that collaboration between the tribes is strengthened during this process and that it is carried through into the second phase of the project (testing of contaminants in whole specimens and parts) when that occurs.

PROJECT GOALS AND OBJECTIVES:

We are looking to protect the health of Alaska Native Indian Tribal members around the Sug'piaq area by limiting exposure to contaminants, obtained through the consumption of fish and other traditionally consumed foods, through the collection and dissemination of accurate information concerning tribal members' subsistence consumption rates, habits, preparation and cooking methods. Tribal members will eventually use these data to make determinations for consumption of these resources. Healthy Levels for consumption will be ascertained based upon the above factors as well as age (children vs. adult) after levels of contaminants (dioxins, heavy metals, and PCBs) have been determined for whole specimens and parts prepared and cooked in different traditional ways. In this proposed study, STK will:

- 🔍 Increase collaboration between STK and tribal environmental/EPA staff from the Ouzinki, Larsen Bay, Karluk, Akhiok, and Old Harbor tribes
- 🔍 Interview tribal members
- 🔍 Obtain quantitative data on consumption by tribal members (i.e. amount consumed and how often) as it pertains to fish species, age of person interviewed, breast feeding, preparation method (whole fish and/or fish parts (head, fillet, skin, eggs, bones, organs)), cooking method (raw, dried, boiled, broiled, baked, roasted, pan fried, deep fried, smoked, poached, canned), special events/ceremonies, and where fish is obtained (locally or brought in from outside Sug'piaq Area)
- 🔍 Obtain quantitative data on consumption by tribal members (i.e. amount consumed and how often) of non-fish subsistence resources such as clams, black leather chitons (bidarkis), limpets, blue mussels, octopus, harbor seal, sea lion and sea birds (including sea ducks).
- 🔍 Determine average daily consumption rates (for children and adult tribal members) for fish and non-fish subsistence resources

PROJECT DESCRIPTION:

The proposed project and corresponding budget is for a period of 12 months (October 1, 2011 through September 30, 2012). The majority of the effort will be achieved with STK Environmental Department staff although there will be close collaboration with IGAP EPA/Environmental staff from the villages of Ouzinki, Larsen Bay, Karluk, Akhiok, and Old Harbor tribes. The STK's Project Manager (part-time; Approximately 20 hours per week) and will organize and coordinate all project activities (under the supervision of STK's Natural Resources Director). Project Manager will design the subsistence consumption assessment form in collaboration with environmental staff from the other villages. Assessment forms will address 24-hour dietary recall, seasonal, annual and daily fish consumption rates, consumption of fish parts, fish preparation methods, breast-feeding, sources of fish consumed and fish consumption as a result of cultural and other special events. Tribal members interviewed will be asked questions about their consumption of different species of fish as well as consumption of specific fish parts. Food models approximating different sizes of fish fillets will be utilized to obtain more accurate estimates of fish quantities consumed by respondents. Respondents will also be asked to provide information about consumption of fish species and fish parts for one child 17 years of age or less residing in the respondent's household (if applicable). Adult tribal members will also be asked about consumption of non-fish subsistence foods on a yearly basis, such as how frequently they are eaten and in what amount. Interviews will be conducted in person at a designated location within each village at arranged times. Only persons who are tribal members and who primarily reside within the villages will be interviewed. Due to differences in the population sizes of the tribes, an equal number of interviews will be sought from each tribe. This number will be determined after consulting with the other village EPA/Environmental staff. Data for the assessment will most likely be collected following a stratified sampling design with each tribe representing an individual stratum or "subpopulation" although final sampling methods will be determined upon consensus from project partners and consistent with EPA approved QAPP. While data for individual tribes will not be weighted, pooled data will be according to the proportion of each subpopulation (i.e. tribe) sampled.

Project Manager will arrange and lead initial meetings, in which she will meet with project partners, in Q1 to discuss the project and develop the assessment questionnaire form. The meetings will be held in each of the four communities at their environmental offices or at a tribal council meeting. Assessment questionnaire forms will be fully developed, and approved by all project partners, by the end of Q1. In Q3, Project Manager and Natural Resources Director will travel to each village and will train each interviewer in proper interviewing techniques and to insure uniformity in methodology. In Q3, interviews will be conducted in each village under the supervision of the project manager and the Natural Resources Director. All completed assessment questionnaires will be given to Project Manager who will then enter the information into an Excel spreadsheet, summarize findings, and write a final report between Q3 and Q4. To protect confidentiality, information revealing participant identity will not be entered into the data (assigned numbers will be used instead) nor will the identity of any participants be shown in the final report. Confidentiality agreements will be signed by all

project partners stating that none of the information provided in the data or the assessment will be revealed before release of the final report. In Q4, copies of the final report and an one-page success story will be shared with project partners. A teleconference will be also held in STK's conference room to present findings to project partners via some compatible video conference format. Throughout the entire project, frequent communication will be maintained with all project partners, by phone and/or e-mail, to insure project progress and continuity.

PROJECT TASKS:

- STK's Natural Resources Director will designate through an employee search a Project Manager
- Introduce project to partner tribes
- Travel to each village to meet with tribal administration and environmental staff
- Develop FY14 work plan for 2nd phase of project
- Develop and finalize subsistence consumption assessment form and data
- Develop QAPP
- Develop training materials, interviewer guides, and standard forms
- STK's project manager and Natural Resources Director will travel to each village to assist with subsistence consumption assessment interviews
- Collect, store, and analyze assessment data
- Generate Final Summary Report and one-page success story

MANAGEMENT AND FINANCIAL CAPABILITIES:

Sun'aq Tribe of Kodiak (STK) is a federally recognized Tribe located in Kodiak, Alaska.

The Sun'aq Tribe of Kodiak is governed by the Sun'aq Tribal Council which is elected by the tribal membership annually. The Council holds regular monthly meetings on the last Tuesday. Committee and staff meetings are conducted before the Council meetings to ensure strong business management of the tribe. Council seats are unpaid positions and council members each volunteer at least 10 hours of their time each month to tribal business like being in committees that they are interested in. This ensures the capacity of the Council by being involved with tribal business. The Council delegates day to day administrative duties and responsibilities to the Chief Executive Officer, who answers directly to the Council for program and fiscal administration of programs, grants, and contracts. The Chief Executive ensures that policies and directives of the council are carried out and that tribal staff are performing effectively.

The Chief Executive further ensures that tribal programs are implemented in accordance with Council and Grant objectives and supervises all tribal office staff.

The tribal office consists of a Financial Director, Executive Assistant, Receptionist, Tribal Programs Director, Natural Resource and Environmental Director, program services, economic development, social services, and a Youth Specialist. The staff is also responsible for carrying out the vision and directives of the council.

The Tribe has experience undertaking and successfully managing projects related to our long-term goals of self-sufficiency, self-governance, and strong tribal membership.

STK is currently in our 6th year of developing and operating our EPA Tribal Environmental Program. The Natural Resources Director attends trainings, conferences and meetings to further his education and improve upon our program. The Natural Resources Director works with other Tribes and government entities to increase our management capabilities to eventual self-governance.

The Sun'aq Tribe of Kodiak Tribal Council provides overall vision and guidance for STK's environmental assessment activities with assistance and input from local traditional knowledge experts and elders. The STK council assists project staff in making decisions that will best address the Tribe's priority environmental and natural resource issues and concerns. STK's President/CEO will oversee all project operations and will be responsible for ensuring that outcomes are produced and that project quality is maintained.

Responsibility for managing the scope of work and reporting is that of the Natural Resources Director, Rick Rowland. STK's Project Manager, when hired, (proposed Project Manager) will report to the Natural Resources Director, and both will provide monthly reports to the President/CEO, who in turn, reports to the Tribal Council. STK's key personnel are both professional and experienced in their respective fields.

Their range of qualifications, skills and experience, combined with their good standing in the community, constitute a valuable team for management and administration of this project.

- Robert Polasky, President/Chief Executive Officer (CEO)

Mr. Polasky has been assisting tribal government for most of his 18 year career in Alaska and the Pacific Northwest. He has been able to assist the Sun'aq Tribal Council with developing the administration and growth of the tribe over the ten plus years in Kodiak, Alaska.

Rick Rowland, Natural Resources Director

Mr. Rowland is originally from the island of Afognak, is Alaska Native Indian and was born in Kodiak, Alaska. With a Bachelors degree in education from the University of Alaska Anchorage 2002 he became interested in assisting tribal governments after college. He began working for Sun'aq Tribe of Kodiak a few

years ago and has assisted with the growth of the natural resources department significantly. Currently, in the Natural Resources Department there are five grants; Indian General Assistance Program, CERCLA Sec. 128a State and Tribal Response Program, Administration for Native American Environmental Grant, Resource Conservation Management Grant, Tribal Wildlife Grant Salmon Enhancement Project.

Mr. Rowland will collaborate with the Project Manager to oversee and assist with successfully completing all assessment objectives. All sampling personnel and project team members will be thoroughly instructed in the specific procedures, methods and quality assurance guidelines prior to conducting the assessment.

- PROJECT MANAGER (PROPOSED PROJECT MANAGER) – 1 PTE

The Manager will work directly under the supervision of Mr. Rowland and will be responsible for general project implementation and meeting all reporting requirements. The Project Manager will also plan and coordinate all project activities. STK's Project Manager will work under the direction and oversight of the Natural Resources Director.

The Natural Resources Director continues to work with the Finance Department and the Council to enhance the Tribes capability to manage federal and non-federal grants and programs. Sun'aq Tribe of Kodiak has yearly annual audits and has had no findings noted. The Tribe has many other grants that help the Tribal members and the community as a whole. Some of these programs include, elderly and low-income housing, counseling for drug and alcohol, after school programs for the kids, education programs in Kodiak. The Tribe administers federal grants and contracts, which are generally of a cost-reimbursement type. Grants and contracts include provisions for advances and billings for costs on a reimbursable basis. Revenues and receivables are generally recorded when reimbursable expenses are incurred to the extent of the grant or contract amount. Indirect expenses, which benefit all programs, are allocated to the various funds by contractual agreement. Each program has negotiated an administrative or indirect cost budget, and costs approved by each agency are allocated to the appropriate fund according to these budgets. In our program we hope to continue and grow and be beneficial to our Tribe and its members for generations to come by being able to be proactive on the diminishing resources, through identification of problems, collaborating with agencies to assist us, and developing ways to stop some of the depletion. STK under the Natural Resources Department currently has six grants. These grants are from EPA, ANA, BIA, DOE and the USFWS, two of which are from EPA. The STK has quarterly and annual reports as well as an annual reports that is distributed to all tribal members, one is included with this proposal. We are currently up to date with all grants reporting and turning in outputs to these grants.

ACCOMPLISHMENTS:

STK is currently in the process of establishing an Memorandum of Understanding with the USCG Kodiak Base related to customary/traditional practices regarding Alaska Native Indian food use and historical debris on the Military Property. STK has

established an ongoing relationship with the Kodiak Island Borough and State of Alaska leadership as well as significant contacts in Washington, DC related to environmental issue and stewardship topics.

The Sun'aq Tribe of Kodiak first received IGAP funding in October, 2005 and is currently in the 3rd cycle IGAP agreement, with funding scheduled to end September 30, 2012. Sun'aq Tribe has been working on capacity building for its environmental programs, to build a strong base for future program development. Over the years, our program has accomplished many things. We have learned a lot about environmental issues, and we are proud of our efforts to educate the community about the importance of a healthy environment. However, funding is a serious limitation, and we still have a long way to go toward building capacity to actually address our environmental and public health priorities. We have made some progress, but so much is still needed, in building our administrative, communication, and solid and hazardous waste management capabilities. The Tribe has just begun building technical capacity, and has not yet begun developing legal or enforcement and compliance capabilities.

In the fiscal years of 2005-2007 was the first time the Sun'aq Tribe of Kodiak had applied for IGAP and it was a start to build capacity and infrastructure of the tribal Council to be able to establish a government responsive to environmental issues, tribal members, and the community. With this in practice the council has been able to identify environmental issues and concerns of the members. With continued capacity building, the Council has also been able to establish communications with other Kodiak Tribes, City, Borough, State and Federal agencies to deliver information between all entities. With these put in place the IGAP program is helping to develop awareness of common environmental unmet needs and subsistence and traditional beliefs and practices, and incorporate these into environmental management.

There was a limited community environmental assessment done in 2006, and it was determined that the tribe needed to lead in stewardship of the area, educate the people through involvement and participation about what harmful toxics are in the area, determine how to prevent deterioration of our once healthy environment, and create community projects and programs to find and address the mass of issues.

For the past several years, the Sun'aq Tribe of Kodiak Environmental Program has worked with FAA on the improvement of the Kodiak Airport. The local tribes of Kodiak have been involved with the process since it started. In FY10 and FY11, Sun'aq Tribe of Kodiak worked with EPA on reissuance of the U.S. Coast Guard RCRA permit. Sun'aq Tribe has been involved in these projects to ensure that we are reprimed of what is going on and have input, and that regulations are followed and activities are environmentally safe. As of Spring 2011 the FAA is still in the process of developing the Environmental Impact Statement and is projecting that the final Draft will be released with an alternative selected by August, 2011.

Currently the Environmental and Natural Resources department has an Association for Native Americans (ANA) Environmental Capacity building grant that is assisting the tribe

with gaining an understanding of most of the traditional natural resource items, and having community work planning sessions for communicating with the members about subsistence. The tribe also acquired a grant from the US Fish and Wildlife Service for Alaska Migratory Bird Co-Management. This gave the opportunity for the Tribes on Kodiak to have meetings regarding bird subsistence. The tribe has applied to the BIA regarding a subsistence survey for all of Kodiak Residents. During 2010 and 2011, the Tribe applied for a Tribal Wildlife Grant with the US Fish and Wildlife Services for a Fisheries enhancement project, and has applied for an EPA Sec 128a Tribal Response Program in 2012. We hope to continue communications and planning with elders of the community through Environmental Committee meetings.

Sun'aq Tribe of Kodiak has been a member of the tribal Solid Waste Advisory Network and the Kodiak Tribal Environmental Network Consortium. Solid Waste and Recycling are still big issues on Kodiak Island, Gulf of Alaska, and Bering Sea and STK hopes to partner with organizations and create networks to help implement solid waste and recycling activities in the communities.

STATUTORY AUTHORITY

The tribe has developed this proposal under the statutory authority provided by the Indian Environmental General Assistance Program Act of 1992. This proposal is consistent with: the EPA's 2011-2015 Strategic Plan Goal 3- Cleaning Up Communities and Advancing Sustainable Development; and with Cross-cutting Strategies: Expanding the Conversation on Environmentalism, Working for Environmental Justice and Children's Health, and Strengthening State, Tribal, and International Partnerships.

PERFORMANCE & REPORTING

The tribe will conduct work in accordance with the approved Workplan and budget, terms and conditions of the agreement, and applicable laws and regulations. The tribe will submit regular and timely drawdown requests to EPA, consistent with payroll and other approved expenditures.

Within 30 days of the end of each fiscal quarter, the tribe will submit a Quarterly Performance Report that:

- details specific accomplishments toward completion of each Workplan task;
- discusses the effectiveness of work performed under each Workplan component;
- identifies and existing or potential problems that could impact or delay completion of any task, output, or deliverable;
- describes current financial status and any significant differences between estimated costs and actual expenses;
- suggests Workplan and budget changes and/or schedules for improvement as necessary; and
- includes all deliverable work products noted in the Workplan for the quarter.

Within 30 days of the end of each fiscal year (no later than October 30th), the tribe will submit an annual Disadvantaged Business Enterprise (DBE/MBE/WBE) Report.

ROLES

The tribe and the EPA will monitor program progress. If sufficient progress is not being made under the Workplan, the tribe and EPA will negotiate a resolution that addresses the issues. Reporting and joint performance evaluation will help ensure that the grant is being administered properly, and that work conducted is in accordance with the approved Workplan and budget.

The EPA will have no substantial involvement in the accomplishment of Workplan tasks. The EPA will monitor progress and provide technical assistance to the tribe as necessary and able to ensure project completion.

REFERENCES

(ATSDR) Agency for Toxic Substances and Disease Registry 2009. Evaluation of seafood and plant data collected from Cook Inlet near the native villages of Port Graham, Nanwalek, Seldovia, and Tyonek, Alaska. US Department of Health and Human Services, Atlanta, GA. July 2009.

(MMS) Mineral Management Service Alaska OCS Region. 2003. Final environmental impact statement: Cook Inlet planning area oil and gas lease sales 191 and 199. US Department of the Interior. Available at <http://www.mms.gov/Alaska/ref/AKPUBS.HTM>. Last accessed 23 June 2005.

(USEPA) US Environmental Protection Agency. 2000. Human health risk assessment of chemical contaminants in seafood from Cook Inlet, Alaska (Draft Report, Version 2), Washington DC, VA. September 2000.

(USEPA) US Environmental Protection Agency. 2002. Estimated per capita fish consumption in the United States. EPA-821-C-02-003, Washington DC, VA. August 2002

(USEPA) US Environmental Protection Agency. 2003. Survey of chemical contaminants in fish, invertebrates, and plants collected in the vicinity of Tyonek, Seldovia, Port Graham, and Nanwalek-Cook Inlet, AK. EPA-910-R-01-003. Seattle, WA. August 2003 (revised version released December 2003).